

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2019-225-E

IN THE MATTER OF:)	
)	
South Carolina Energy Freedom Act)	
(House Bill 3659) Proceeding Related)	PETITION TO INTERVENE
to S.C. Code Ann. Section 58-37-40 and)	BY NUCOR STEEL –
Integrated Resource Plans for Duke)	SOUTH CAROLINA
Energy Progress, LLC)	
)	

Nucor Steel-South Carolina (“Nucor”), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC (“DEP”) (formerly known as Progress Energy (“Progress Energy”) and Carolina Power & Light Company (“CP&L”)), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars per year. Since the cost of electricity comprises one of the major costs of Nucor’s manufacturing process, electric costs directly affect Nucor’s ability to continue to produce steel at a competitive price.
2. This docket has been established to review DEP’s 2020 Integrated Resource Plan (“IRP”). In addition to addressing resources, capacity and affordability issues, the IRP “details potential resource portfolios to match forecasted electricity requirements, including an appropriate reserve margin, to maintain system reliability for customers over the next 15 years.” IRP at 4. As a large industrial customer of DEP, Nucor has an interest in the topics discussed in the IRP, including DEP’s current long-term energy and demand forecasts and DEP’s plans for meeting its future resource needs.
3. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this stage in the proceeding,

Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the public hearing to be held in this proceeding. Since 1987, Nucor has actively participated in many previous DEP, Progress Energy and CP&L proceedings before this Commission.

4. Nucor's mailing address is:

Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532

5. Nucor will be jointly represented in this proceeding by the firms of Stone Mattheis Xenopoulos & Brew, PC (formerly Brickfield, Burchette, Ritts & Stone, PC) and Moore & Van Allen, PLLC. Stone Mattheis Xenopoulos & Brew, PC represents Nucor in matters regarding electric rates and service in jurisdictions throughout the United States. In the past, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 T(1)(b) of the Commission's Rules of Practice and Procedure, for the purposes of this proceeding, Stone Mattheis Xenopoulos & Brew, PC is associated with the firm of Moore & Van Allen, PLLC, whose attorneys are licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to both the undersigned firms.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

A handwritten signature in black ink, appearing to read "Rob Smith", written in a cursive, stylized script.

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Counsel for Nucor Steel – South Carolina

Dated: October 27, 2020

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BY NUCOR STEEL –
SOUTH CAROLINA**

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail or electronic mail on this the 27th day of October, 2020:

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